

CLEARY GOTTlieb STEEN & HAMILTON LLP

AMERICAS  
NEW YORK  
SAN FRANCISCO  
SÃO PAULO  
SILICON VALLEY  
WASHINGTON, D.C.

ASIA  
BEIJING  
HONG KONG  
SEOUL

One Liberty Plaza  
New York, NY 10006-1470  
T: +1 212 225 2000  
F: +1 212 225 3999  
clearygottlieb.com

D: +1 212 225 2508  
cboccuzzi@cgsh.com

EUROPE & MIDDLE EAST  
ABU DHABI  
BRUSSELS  
COLOGNE  
FRANKFURT  
LONDON  
MILAN  
PARIS  
ROME

June 24, 2025

VIA ECF

The Honorable Alvin K. Hellerstein  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1050  
New York, New York 10007

So ordered.

/s/ Alvin K. Hellerstein, U.S.D.J.  
6/26/25

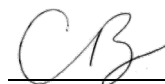
Re: *Kashef v. BNP Paribas S.A.*, No. 16-cv-3228 (AKH)(JW)

Dear Judge Hellerstein:

This firm and Gibson, Dunn & Crutcher LLP represent Defendants BNP Paribas S.A. (“BNPP”) and BNP Paribas U.S Wholesale Holdings, Corp. (together “Defendants”) in the above-referenced action. Pursuant to Rule 4.B of the Court’s Individual Rules, we write to request leave to file on the public docket redacted versions of certain documents produced by BNPP that were filed in connection with Defendants’ Memorandum of Law in Support of Motion to Admit Evidence of BNPP’s State of Mind Regarding Sanctions (“Defendants MOL”), as referenced in the Declaration of Charity E. Lee in Support of Defendants’ MOL, and to file unredacted versions of those exhibits under seal.

The redactions applied to these materials, listed in Appendix A, are consistent with the parties’ prior agreement reflected in their joint letter to the Court, *see* ECF No. 500, and Your Honor’s subsequent Order authorizing the parties to apply “narrowly tailored redactions . . . to individuals’ names and other personal information and certain transaction information not at issue in this action,” ECF No. 504.

Respectfully submitted,



Carmine D. Boccuzzi, Jr.

CC: Counsel of Record

The Honorable Alvin K. Hellerstein, p. 2

**Appendix A**

Document
BNPP-KASHEF-00007580
BNPP-KASHEF-00014555
BNPP-KASHEF-00029237